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Attorneys for Karen Williams

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Karen Williams, an Arizona Resident,

Plaintiff,

v.

Alhambra Elementary School District No. 68, a political subdivision of the State of Arizona; **Alhambra Elementary School District No. 68, Board Member Robert Zamora**; **Alhambra Elementary School District No. 68, Board Member Ray Martinez**; and **Alhambra Elementary School District No. 68, Board Member Mari Alvarado**,

Defendants.

Case No. CV-16-00461-PHX-GMS

**STIPULATED MOTION TO
WITHDRAW DEFENDANTS'
MOTION TO DISMISS AND TO
AMEND PLAINTIFF'S COMPLAINT**

Plaintiff Karen Williams (“**Williams**”) and Defendants Alhambra Elementary School District No. 68, et al., by and through their respective undersigned counsels

1 hereby submit this Stipulated Motion to Withdraw Defendants' Motion to Dismiss and to
2 Amend Plaintiff's Complaint in compliance with the Honorable G. Murray Snow's Order
3 dated March 23, 2016. Consistent therewith, the Parties have conferred with respect to
4 Defendants' Motion to Dismiss (Dkt. 7) and have stipulated to the following:

5
6 1. Defendants have hereby stipulated to the withdrawal of their Motion to
7 Dismiss (Dkt. 7).

8
9 2. Plaintiff shall file an Amended Complaint within five (5) days of the date
10 the accompanying proposed order is granted. The Amended Complaint shall clarify and
11 restate certain factual allegations in Plaintiff's complaint claims and shall also clarify
12 which claims are being brought against each Defendant.

13
14 3. Defendants shall have twenty (20) calendar days from the date the
15 Amended Complaint is filed to submit their responsive pleading.

16
17 4. In the event that Defendants file a motion to dismiss following Plaintiff's
18 filing of her Amended Complaint, the parties understand that Defendants must meet and
19 confer prior to the filing of any such motion to dismiss as set forth by the Court's Orders.

20 RESPECTFULLY SUBMITTED March 30, 2016.

21 **COOK & PRICE, PLC**

22 By: /s/ Zachary Price
23 60 E. Rio Salado Parkway
24 Suite 900
25 Tempe, AZ 85281
26 Attorneys for Karen Williams

27 **GUST ROSENFELD P.L.C.**

28 By: /s/ Robert D. Haws
One East Washington St.

Suite 1600
Phoenix, AZ 85004
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Robert D. Haws
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/s/ Zachary Price